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*Attorneys for Defendant Ohio Security
Insurance Company, also erroneously sued as
Liberty Mutual Group, Inc. dba Liberty
Mutual Insurance Company dba Liberty
Mutual, Liberty Mutual Auto and Home
Services, LLC, and Liberty Mutual Insurance
Company dba Liberty Mutual Insurance Co.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KEONI PAUL KULOLOIA,

Plaintiff,

vs.

OHIO SECURITY INSURANCE COMPANY;
LIBERTY MUTUAL GROUP, INC. dba
LIBERTY MUTUAL INSURANCE
COMPANY dba LIBERTY MUTUAL;
LIBERTY MUTUAL AUTO AND HOME
SERVICES, LLC; LIBERTY MUTUAL
INSURANCE COMPANY aka LIBERTY
MUTUAL INSURANCE CO.; DOES 1 through
V; and ROE CORPORATIONS 1 through X,
inclusive,

Defendants.

CASE NO. 2:18-cv-00405-JCM-PAL

**STIPULATION AND ORDER TO
EXTEND DISCOVERY
DEADLINES**

(First Request)

Plaintiff Keoni Paul Kuloloia (“Plaintiff”), Defendants Ohio Security Insurance Company, Liberty Mutual Group, Inc. dba Liberty Mutual Insurance Company dba Liberty Mutual, Liberty Mutual Auto and Home Services, LLC, and Liberty Mutual Insurance Company dba Liberty Mutual Insurance Co., (collectively “Defendants”), by and through their respective counsel of record, hereby stipulate and request that the Court extend certain discovery deadlines by approximately 90 days. This is the parties’ first request to extend any discovery deadlines in this matter.

Pursuant to Local Rule 26-4, the parties state as follows:

I. DISCOVERY COMPLETED TO DATE

- The parties conducted the Fed. R. Civ. P. 26(f) conference.
- The parties have exchanged initial and supplemental disclosures of documents and lists of witnesses.
- Defendants propounded requests for production of documents, requests for admissions and interrogatories on Plaintiffs. Plaintiffs provided responses, and Defendants have requested that Plaintiff supplement those responses.
- The parties have disclosed expert witnesses and rebuttal expert witnesses.

II. DISCOVERY TO BE COMPLETED

- Plaintiff’s written discovery to Defendants
- Deposition of Plaintiff
- Depositions of employees of Ohio Security Insurance Company
- Depositions of additional non-party fact witnesses.
- Depositions of expert witnesses.

The above list is made without prejudice to any party’s ability to conduct additional discovery consistent with the Federal Rules of Civil Procedure.

III. REASONS WHY THE DEADLINES CANNOT BE COMPLETED WITHIN THE CURRENT SCHEDULE

The additional discovery time requested is to provide the parties with additional time to complete deposition discovery in this matter, including the depositions of the parties’ disclosed

1 experts. The parties anticipate taking approximately 10 combined depositions and due to upcoming
2 trials, depositions in other matters, holiday periods, and related travel, the parties are requesting
3 additional time to coordinate dates that are mutually convenient for the witnesses and counsel. The
4 parties have begun discussing scheduling of these depositions and expect that an additional 90 days
5 will provide sufficient time to complete the discovery remaining in this case, including all of the
6 anticipated depositions. The parties agree that this request is not made for the purpose of delay,
7 but to ensure a just adjudication of the case on the merits, and that none of them will be prejudiced
8 by the requested extension.

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1 **IV. PROPOSED SCHEDULE**

2 WHEREFORE, the parties respectfully request that this Court extend discovery deadlines
3 as follows:

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EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Discovery Cut-off Date	October 29, 2018	January 29, 2019
Dispositive Motions	November 28, 2018	February 28, 2019
Pre-Trial Order	The Joint Pre-Trial Order shall be filed no later than 30 days after the date set for filing dispositive motions which shall be December 28, 2018. If dispositive motions are timely filed, the date for filing the Pre-Trial Order shall be suspended.	The Joint Pre-Trial Order shall be filed no later than 30 days after the date set for filing dispositive motions which in this matter would be March 28, 2019 . If dispositive motions are timely filed, the date for filing the Pre-Trial Order would be suspended.

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14 Dated: October 11, 2018

15 EGLET PRINCE

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17 /s/ Dennis M. Prince
18 Dennis M. Prince, Esq.
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20 Tracy A. Eglet, Esq.
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26 *Attorneys for Plaintiffs*

Dated October 11, 2018

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Insurance Company*

24 **ORDER**

25 IT IS SO ORDERED.

26 DATED this 31st day of October, 2018.

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28 UNITED STATES MAGISTRATE JUDGE